

**IN THE UNITED STATES BANKRUPTCY COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: William Vincent Conrad  
Meredith Haleen Conrad f/k/a Meredith Haleen Specht

Debtor(s)

CMG Mortgage, Inc., its successors and/or assigns  
Movant

vs.

William Vincent Conrad  
Meredith Haleen Conrad f/k/a Meredith Haleen Specht  
Debtor(s)

Scott F. Waterman

Trustee

CHAPTER 13

NO. 24-14564 PMM

**PRAECIPE TO WITHDRAW**

**TO THE CLERK OF THE BANKRUPTCY COURT:**

Kindly withdraw the Objection to Confirmation of CMG Mortgage, Inc., which was filed with the Court on or about January 10, 2025.

Dated: April 17, 2025

Respectfully submitted,

/s/ J. Eric Kisnbaugh  
J. Eric Kisnbaugh, Esq.  
KML Law Group, P.C.  
BNY Mellon Independence Center  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
Phone: (215)-627-1322  
dcarlon@kmlawgroup.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: William Vincent Conrad  
Meredith Haleen Conrad f/k/a Meredith  
Haleen Specht**

**Debtor(s)**

**CMG Mortgage, Inc.**

**Movant**

**vs.**

**William Vincent Conrad  
Meredith Haleen Conrad f/k/a Meredith  
Haleen Specht**

**Debtor(s)**

**Scott F. Waterman**

**Trustee**

**BK NO. 24-14564 PMM**

**Chapter 13**

**Related to Claim No. 27**

**CERTIFICATE OF SERVICE**

I, J. Eric Kisnbaugh, certify that on 4/17/2025, I did cause a true and correct copy of the documents described below to be served on the parties listed on the mailing list exhibit, a copy of which is attached and incorporated as if fully set forth herein, by the means indicated and to all parties registered with the Clerk to receive electronic notice via the CM/ECF system:

- Praecepto to Withdraw

I certify under penalty of perjury that the above document(s) was sent using the mode of service indicated.

Dated: 4/17/2025

**/s/ J. Eric Kisnbaugh**

J. Eric Kisnbaugh, Esquire

Attorney I.D. 33078

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BNY Mellon Independence Center

701 Market Street, Suite 5000

Philadelphia, PA 19106

201-549-2363

[bkgroup@kmlawgroup.com](mailto:bkgroup@kmlawgroup.com)

Name and Address of Party Served	Relationship of Party	Via
<p>Meredith Haleen Conrad f/k/a Meredith Haleen Specht 32 Park Road Reading, PA 19609</p> <p>William Vincent Conrad 32 Park Road Reading, PA 19609</p>	Debtors	<p><input type="checkbox"/> Hand-delivered</p> <p><input checked="" type="checkbox"/> First Class Mail</p> <p><input type="checkbox"/> Certified mail</p> <p><input type="checkbox"/> E-mail</p> <p><input type="checkbox"/> CM/ECF</p> <p><input type="checkbox"/> Other</p> <p>_____</p> <p>(as authorized by the court *)</p>
<p>Joseph L. Quinn Ross, Quinn &amp; Ploppert, P.C. 192 South Hanover Street Suite 101 Pottstown, PA 19464</p>	Attorney for Debtors	<p><input type="checkbox"/> Hand-delivered</p> <p><input type="checkbox"/> First Class Mail</p> <p><input type="checkbox"/> Certified mail</p> <p><input type="checkbox"/> E-mail</p> <p><input checked="" type="checkbox"/> CM/ECF</p> <p><input type="checkbox"/> Other</p> <p>_____</p> <p>(as authorized by the court *)</p>
<p>Scott F. Waterman 2901 St. Lawrence Ave. Suite 100 Reading, PA 19606</p>	Trustee	<p><input type="checkbox"/> Hand-delivered</p> <p><input type="checkbox"/> First Class Mail</p> <p><input type="checkbox"/> Certified mail</p> <p><input type="checkbox"/> E-mail</p> <p><input checked="" type="checkbox"/> CM/ECF</p> <p><input type="checkbox"/> Other</p> <p>_____</p> <p>(as authorized by the court *)</p>